

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE: PORK ANTITRUST LITIGATION

Case No. 0:18-cv-01776-JRT-JFD

This Document Relates To:

ALL ACTIONS BROUGHT BY  
COMMERCIAL AND INSTITUTIONAL  
INDIRECT PURCHASER PLAINTIFF  
CLASS, CONSUMER INDIRECT  
PURCHASER PLAINTIFF CLASS, AND  
THE COMMONWEALTH OF PUERTO  
RICO

**DECLARATION OF WILLIAM  
D. THOMSON IN SUPPORT OF  
SEABOARD FOODS LLC'S  
UNOPPOSED MOTION FOR  
LEAVE TO FILE AMENDED  
ANSWERS TO CIIPP, CIPP, AND  
PUERTO RICO COMPLAINTS**

I, William D. Thomson, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner with the law firm of Stinson LLP and am a member in good standing of the bars of the State of Minnesota and the District of Minnesota. I am one of the attorneys representing Defendant Seaboard Foods LLC in this matter. I am familiar with the matters that follow, and I make this declaration based on my own knowledge.

2. Attached to my declaration as exhibits are true and correct copies of the following documents:

Exhibit 1: Defendant Seaboard Foods LLC's proposed amended affirmative defenses to CIIPP & CIPP complaints.

Exhibit 2: A redlined copy of Defendant Seaboard Foods LLC's proposed amended affirmative defenses to CIIPP & CIPP complaints, showing how the proposed amended

affirmative defenses differ from the currently operative versions.

Exhibit 3: Defendant Seaboard Foods LLC's proposed amended affirmative defenses to Puerto Rico complaint.

Exhibit 4: A redlined copy of Defendant Seaboard Foods LLC's proposed amended affirmative defenses to Puerto Rico complaint, showing how the proposed amended affirmative defenses differ from the currently operative version.

Exhibit 5: CIPPs' Objections and Responses to Defendants' First Set of Interrogatories.

Exhibit 6: CIIPPs' Objections and Responses to Defendants' First Set of Interrogatories.

Exhibit 7: Plaintiff Commonwealth of Puerto Rico's Responses and Objections to Defendants' First Set of Interrogatories.

Exhibit 8: CIPPs' Responses to Defendants' First, Second, and Third Set of Interrogatories. **(Filed under seal.)**

Exhibit 9: CIIPPs' Supplemental Objections and Responses to Defendants' First Set of Interrogatories. **(Filed under seal.)**

Exhibit 10: The Commonwealth of Puerto Rico's Objections and Responses to Defendants' First and Second Sets of Interrogatories. **(Filed under seal.)**

Exhibit 11: *Hearing to Review the Economic Conditions Facing the Pork Industry: Hearing Before the Subcommittee on Livestock, Dairy, and Poultry of the Committee on Agriculture, 111th Cong. 56-58 (2009) (statement of Rod K. Brenneman).*

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 29, 2023.

/s/ William D. Thomson  
William D. Thomson